

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

In re Terrorist Attacks on September 11, 2001	03 MDL 1570 (GBD)(SN) ECF Case
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This document relates to:

Cheryl Rivelli, et al v. Islamic Republic of Iran (1:18-cv-11878) (GBD) (SN)

**THE RIVELLI PLAINTIFFS' NOTICE OF MOTION FOR
PARTIAL FINAL JUDGMENT III (Functional Equivalent)**

PLEASE TAKE NOTICE that upon the accompanying Memorandum of Law and Declaration of Jerry S. Goldman, Esq., along with the exhibits appended, ("Goldman Declaration"), certain plaintiffs in the above-referenced matter who are identified on Exhibit A to the Goldman Declaration, by and through their counsel, Anderson Kill P.C., respectfully move this Court for an Order: (1) awarding them judgment as to damages in the same amounts previously awarded by this Court to various similarly situated plaintiffs in *Burnett, Havlish, Ashton, Bauer*, and other cases; (2) determining that Christopher Michael Ruggieri and Phylicia Ruggieri are the functional equivalents of Joseph Rivelli, Jr.'s children, a firefighter who died on September 11, 2001 when the World Trade Center collapsed; (3) awarding them prejudgment interest at the rate of 4.96 percent per annum, compounded annually for the period from September 11, 2001 until the date of the judgment for damages; and (4) granting permission for such plaintiffs to seek punitive damages, economic damages, and other appropriate damages at a later date.

Plaintiffs request is made in connection with the judgment on default entered against the Islamic Republic of Iran on September 3, 2019 as to (1) liability as to all Plaintiffs in the case;

and (2) as to damages to those Plaintiffs specifically named therein. *In re Terrorist Attacks on September 11, 2001*, No. 03-md-1570, ECF No. 5047 (*Rivelli I*).

Respectfully submitted,

/s/ Jerry S. Goldman, Esq.

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